

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

KRAFT FOODS GLOBAL, INC., THE )  
KELLOGG COMPANY, GENERAL )  
MILLS, INC., and NESTLÉ USA, INC., )  
 )  
Plaintiffs, ) No. 1:11-cv-08808  
 )  
v. ) Judge Steven C. Seeger  
 )  
UNITED EGG PRODUCERS, INC., )  
UNITED STATES EGG MARKETERS, )  
INC., CAL-MAINE FOODS, INC., and )  
ROSE ACRE FARMS, INC. )  
 )  
Defendants. )  
 )

**PLAINTIFFS' MOTION TO FILE UNDER SEAL**

Plaintiffs respectfully move the Court for leave to file Plaintiffs' Motion to Preclude Certain Testimony from Dr. Walker and exhibits thereto under seal, pursuant to Local Rules 5.8 and 26.2. In support of this Motion, Plaintiffs state as follows:

1. Plaintiffs' Motion and exhibits thereto, filed today, include references to Dr, Walker's expert reports, all which have been designated as highly confidential. Pursuant to Local Rule 26.2(c), Plaintiffs have provisionally filed Plaintiffs' Motion and exhibits under seal.
2. As the Seventh Circuit has recognized, a Court may keep documents or portions thereof under seal if "there is good cause for sealing a part or the whole of the record." *Citizens First Nat'l Bank of Princeton v. Cincinnati Ins. Co.*, 178 F.3d 943, 945 (7th Cir. 1999); *see also* Local Rule 26.2(b) (applying "good cause" standard). Accordingly, the Court may seal filings if there are "legitimate concerns of confidentiality," *Grove Fresh Dist., Inc. v. Everfresh Juice Co.*, 24 F.3d 893, 898 (7th Cir. 1994).

3. Here, The Motion and exhibits thereto contain information designated by Dr, Walker as highly confidential. This presents a legitimate concern of confidentiality and gives good cause to file the Motion and exhibits to the Motion under seal.

*[Remainder of page intentionally left blank.]*

WHEREFORE, Plaintiffs respectfully request the Court enter an order granting it leave to file the Motion and exhibits to the Motion under seal.

November 10, 2023

Respectfully submitted,

***Counsel for Plaintiffs Kraft Foods Global, Inc.,  
General Mills, Inc., Nestlè USA, Inc. and The  
Kellogg Company***

/s/ Brandon D. Fox

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